Croxton
WA 6906
4a

Facility: Ridgefield Brick and Tile Company (RBT)

ID No. WAD009036906

Date of Inspection: June 6, 1989
Date of Report June 9, 1989

Address: 3510 NW 289th Street
Ridgefield, Washington 98642

Report prepared by: Jack Boller Jack Boller, Environmental Protection Specialist
EPA Region 10
Washington Operations Office
Olympia, Washington 98504

Inspector: Jack Boller, EPA/WOO

Purpose:

This inspection was conducted to gather information on facility compliance with applicable regulations for management of hazardous waste under the Washington State and United States hazardous waste laws.

General Facility Process Information:

Ridgefield Brick and Tile (RBT) is owned and operated by Pacific Wood Treating, Inc. The location was formerly the site of a brick manufacturing facility. Pacific Wood Treating bought the site and began using the clay pit to landfill ash from the waste incinerator operating at its Wood Treating facility in Ridgefield. The site stopped receiving waste on January 4, 1983. Since then, a clay cap has been placed over the landfill and a leachate system was installed. A toe drain feeds leachate into a collection tank. When the tank is full, the contents are shipped by a tank truck to Crosby & Overton in Kent, Washington. An underdrain collects water that flows under the site and discharges it into the ditch along the road that runs past the site.

Notification and Report:

Notification of hazardous waste activities at RBT was filed as part of the Pacific Wood Treating notification on August 11, 1980. A part A application was filed for the site on May 19, 1983. A closure plan has been submitted and is currently undergoing EPA review.

Inspection:

On June 6, 1989 I arrived at PWT in Ridgefield, Washington to conduct an inspection of both PWT and RBT where PWT had formerly operated a hazardous waste landfill. I discussed the RBT facility's status with Mr. Bryant Adams, the facility's environmental coordinator. I also conducted a tour of RBT. The wells appeared to be in good condition. The site has become a grassy field and at the time of the inspection there was a heavy growth of grass and wild flowers. Currently the compliance issues at the site all concern the adequacy of the groundwater monitoring system which is beyond the scope of this inspection. The problem is being addressed by Region 10 hydrogeology staff.

Conclusion:

No new violations were found. The facility wishes to complete closure, however, questions concerning the adequacy of the groundwater monitoring system need to be answered before closure can be completed.

DOCUMENT SUMMARY

Document Id: 0162F
Document Name: Ridgefield Brick & Tile
Operator: michelle
Author: jack

Comments: #N

STATISTICS

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Notify U01 on system VOL1.

Mount Special Forms

EXHIBIT IV-1

GENERAL SITE INSPECTION INFORMATION FORM

A. Site Name: Ridgefield Brick and Tile
B. Street (or other identifier): 3510 NW 299th St
C. City: Ridgefield
D. State: Wa
E. Zip Code: 98642
F. County Name: Clark

G. Site Operator Information

1. Name: Bryant Adams
2. Telephone Number: (206) 887-3562
3. Street: 111 W Division
4. City: Ridgefield
5. State: Wa
6. Zip Code: 98642

H. Site Description

I. Type of Ownership

__1. Federal __2. State __3. County __4. Municipal X5. Private

J.

closed

__1. Generator __2. Transporter __3. Treatment __4. Storage X5. Disposal

K. Regulatory Status

Closed in post closure monitoring

__1. Interim Status
__2. Permitted Facility
__3. Part B Permit Application Submitted
__4. Part B Permit Application in Preparation

L.

1. Principal Inspector Name: Jack Boller
2. Title: Environmental Protection Specialist
3. Organization: EPA R-10/WOO
4. Telephone No. (area code and No.): (206) 753-9428 FTS 434-9428

M. Inspection Participants

1.	6.
2.	7.
3.	8.
4.	9.
5.	10.

EXHIBIT IV-1

GENERAL FACILITY CHECKLIST

Section A - General Facility Standards

1. Does facility have EPA Identification No.? X Yes __ No

   a. If yes, EPA I.D. No. WAP009036906
      If no, explain. _____

2. Has facility received hazardous waste from a foreign source? __ Yes X No

   a. If yes, has it filed a notice with the Regional Administrator? __ Yes __ No N/A

Waste Analysis

3. Does facility maintain a copy of the waste analysis plan at the facility? X Yes __ No

   a. If yes, does it include:

      1. Parameters for which each waste will be analyzed? X Yes __ No
      2. Test methods used to test for these parameters? X Yes __ No
      3. Sampling method used to obtain sample? X Yes __ No
      4. Frequency with which the initial analyses will be reviewed or repeated? X Yes __ No
      5. (For offsite facilities) waste analyses that generators have agreed to supply? X Yes __ No
      6. (For offsite facilities) procedures which are used to inspect and analyze each movement of hazardous waste, including:

         a. Procedures to be used to determine the identity of each movement of waste. X Yes __ No
         b. Sampling method to be used to obtain representative sample of the waste to be identified. X Yes __ No

4. Does the facility provide adequate security through:

   a. 24-hour surveillance system (e.g., television monitoring or guards)? __ Yes __ No N/A

   OR

(continued)

b. 1. Artificial or natural barrier around facility (e.g., fence or fence and cliff)? X Yes __ No

Describe fence around old landfill

AND

2. Means to control entry through entrances (e.g., attendant, television monitors, locked entrance, controlled roadway access)? X Yes __ No

Describe locked gate

General Inspection Requirements

5. Does the owner/operator maintain a written schedule at the facility for inspecting: Not an operating facility. GW monitor system only.

a. Monitoring equipment? __ Yes X No
b. Safety and emergency equipment? __ Yes X No
c. Security devices: __ Yes X No
d. Operating and structural equipment? __ Yes X No
e. Types of problems of equipment:

1. Malfunction __ Yes __ No
2. Operator error __ Yes __ No
3. Discharges __ Yes __ No

6. Does the owner/operator maintain an inspection log? __ Yes X No

a. If yes, does it include:

1. Date and time of inspection? __ Yes __ No
2. Name of inspector? __ Yes __ No
3. Notation of observations? __ Yes __ No
4. Date and nature of repairs or remedial action? __ Yes __ No

b. Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet.) __ Yes __ No

Personnel Training

7. Does the owner/operator maintain personnel training records at the facility? X Yes __ No

(continued)

How long are they kept? for term of employment

a. If yes, do they include:

1. Job title and written job description of each position? X Yes __ No
2. Description of type and amount of training? X Yes __ No
3. Records of training given to facility personnel? X Yes __ No

Requirements for Ignitable, Reactive, or Incompatible Waste

8. Does facility handle ignitable or reactive wastes? __ Yes X No

a. If yes, is waste separated and confined from sources of ignition or reaction (open flames, smoking, cutting and welding, hot surfaces, frictional heat), sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat?

1. If yes, use narrative explanation sheet to describe separation and confinement procedures.
2. If no, use narrative explanation sheet to describe sources of ignition or reaction.

N/A

b. Are smoking and open flame confined to specifically designated locations? __ Yes __ No

c. Are "No Smoking" signs posted in hazardous areas? __ Yes __ No

d. Are precautions documented (Part 264 only)? __ Yes __ No

9. Check containers

a. Are containers leaking or corroding? No containers __ Yes __ No

b. Is there evidence of heat generation from incompatible wastes? __ Yes __ No

Section B - Preparedness and Prevention

1. Is there evidence of fire, explosion, or contamination of the environment? __ Yes X No

If yes, use narrative explanation sheet to explain.

(continued)

2. Is the facility equipped with:

   a. Internal communication or alarm system? ___Yes ___No

      1. Is it easily accessible in case of emergency? ___Yes ___No

   b. Telephone or two-way radio to call emergency response personnel? X Yes ___No

   c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? X Yes ___No

   d. Water of adequate volume for hoses, sprinklers, or water spray system? X Yes ___No

      1. Describe source of water Ridgefield

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? ___Yes ___No

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) X Yes ___No

5. In the case that more than one police or fire department might respond, is there a designated primary authority? X Yes ___No

   a. If yes, name primary authority Ridgefield fire dept.

6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors, and equipment suppliers? X Yes ___No

   a. Are they readily available to all personnel? X Yes ___No

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? X Yes ___No

8. If State or local authorities decline to enter, is this entered in the operating record? X Yes ___No

(continued)

Section C - Contingency Plan and Emergency Procedures

1. Is a contingency plan maintained at the facility? Kept at PW T site — X Yes __ No

   a. If yes, is it a revised SPCC Plan? X Yes __ No

   b. Does contingency plan include:

      1. Arrangements with local emergency response organizations? X Yes __ No
      2. Emergency coordinators' names, phone numbers, and addresses? X Yes __ No
      3. List of all emergency equipment at facility and descriptions of equipment? X Yes __ No
      4. Evacuation plan for facility personnel? X Yes __ No

2. Is there an emergency coordinator on site or on call at all times? X Yes __ No

Section D - Manifest System, Recordkeeping, and Reporting

1. Does facility receive waste from offsite? __ Yes X No

   a. If yes, does the owner/operator retain copies of all manifests? __ Yes __ No

      1. Are the manifests signed and dated and returned to the generator? __ Yes N/A No
      2. Is a signed copy given to the transporter? __ Yes __ No

2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? __ Yes X No

   a. If yes, is it accompanied by a shipping paper? __ Yes __ No

      1. Does the owner/operator sign and date the shipping paper and return a copy to the generator? __ Yes N/A No
      2. Is a signed copy given to the transporter? __ Yes __ No

3. Has the owner/operator received any shipments of waste that were inconsistent with the manifest (manifest discrepancies)? __ Yes X No

   a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter? __ Yes __ No

      1. If no, has Regional Administrator been notified? __ Yes N/A No

(continued)

4. Does the owner/operator keep a written operating record at the facility? __Yes X No

Not an operating facility

a. If yes, does it include:

1. Description and quantity of each hazardous waste received? __Yes __No
2. Methods and dates of treatment, storage, and disposal? __Yes __No
3. Location and quantity of each hazardous waste at each location? __Yes __No
4. Cross-references to manifests/shipping papers? __Yes __No
5. Records and results of waste analyses? __Yes __No
6. Report of incidents involving implementation of the contingency plan? __Yes __No
7. Records and results of required inspections? __Yes __No
8. Monitoring or testing analytical data (Part 264)? __Yes __No
9. Closure cost estimates and, for disposal facilities, post-closure cost estimates (Part 264)? __Yes __No
10. Notices of generators as specified in §264.12(b) (Part 264)? __Yes __No

5. Does the facility submit a biennial report by March 1 every even-numbered year? X Yes __No

a. If yes, do reports contain the following information:

1. EPA I.D. number? X Yes __No
2. Date and year covered by report? X Yes __No
3. Description/quantity of hazardous waste? X Yes __No
4. Treatment, storage, and disposal methods? X Yes __No
5. Monitoring data under §265.94(a)(2) and (b)(2) (Part 265)? X Yes __No
6. Most recent closure and post-closure cost estimates? X Yes __No
7. For TSD generators, description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year? X Yes __No
8. Certification signed by owner/operator? X Yes __No

6. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? __Yes X No

a. If yes, has he submitted an unmanifested waste report to the Regional Administrator? __Yes __No N/A

7. Does the facility submit to the Regional Administrator reports on releases, fires, and explosions; contamination and monitoring data; and facility closure? X Yes __No

EXHIBIT IV-3

LAND DISPOSAL RESTRICTIONS CHECKLIST

1. Are hazardous wastes land-disposed on site? ("Land disposal" includes placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, salt dome formation, salt bed formation, underground mine or cave, concrete vault, or bunker intended for disposal purposes; and placement in or on the land by means of open detonation and open burning where residues continue to exhibit hazardous characteristics). __Yes X No not any more

   a. If yes, are one or more of the following circumstances true:

      1. Granted extension from effective date pursuant to §268.5? __Yes __No
      2. Granted exemption from a prohibition pursuant to a petition under §268.6? __Yes __No
      3. Disposing of soil or debris resulting from a CERCLA response action or a RCRA corrective action, which will not be prohibited until November 8, 1988? __Yes __No N/A
      4. Facility is a small quantity generator of less than 100 kg of hazardous waste per month? __Yes __No

2. Are restricted wastes or residuals from treatment of a restricted waste diluted in any way prior to disposal? __Yes X No

3. Are there active surface impoundments used for treatment of hazardous wastes? __Yes X No

   a. If yes, does the unit's design and operation meet the requirements set forth in §268.4? __Yes __No N/A

4. Has the facility sought exemption from any prohibition under Subpart C of §268 for the disposal of a restricted hazardous waste? __Yes X No

   a. If yes, has the facility's demonstration included the required components (waste I.D., waste analysis, comprehensive environmental characterization of unit site, QA/QC plan, sampling, testing, modeling)? __Yes __No N/A

5. Has the facility determined whether it generates a restricted waste through waste analysis? X Yes __No

   a. If yes, is the facility, in fact, handling a restricted waste(s)? __Yes X No

(continued)

EXHIBIT IV-3 (continued)

b. If yes, does the restricted waste require treatment? __Yes __No

c. If yes, has the generator notified the treatment facility in writing, and does the notification include all required components (EPA hazardous waste number, corresponding treatment standard, manifest number of shipment)? __Yes __No N/A

6. Does the facility handle EPA Hazardous Waste Nos. F001 through F005 (solvent wastes)? __Yes X No

a. If yes, do any of the following conditions apply:

1. The generator of the solvent waste is a small quantity generator (not more than 1000 kg/month)? __Yes __No
2. The solvent waste is generated from a CERCLA response corrective action? __Yes __No
3. The solvent waste is a solvent-water mixture, solvent-containing sludge, or solvent-contaminated soil (non-CERCLA or RCRA corrective action) containing less than 1 percent total F001 through F005 solvent constituents. __Yes __No N/A

b. If no, have any of these restricted wastes been land-disposed (except in an injection well) since November 8, 1986? __Yes __No N/A

7. Does the facility handle EPA Hazardous Waste Nos. F020, F021, F023, F026, F027, or F028 (dioxin-containing wastes)? __Yes X No

a. If yes, do any of the following conditions apply:

1. Wastes are treated to meet standards of Subpart D of §268? __Yes __No
2. Wastes are disposed of at a facility that has been granted a petition? __Yes __No
3. An extension has been granted? __Yes __No N/A

b. If no, will these restricted wastes be land disposed after November 8, 1988? __Yes __No

8. Are restricted wastes being treated? __Yes X No

a. If yes, have any of their associated hazardous constituents exceeded the "Constituent in Waste Extract" (CWE) levels? __Yes __No N/A

EXHIBIT IV-10

LANDFILLS CHECKLIST

Section A - Design Requirements

Landfill was closed and backfilled with soil. No longer receiving waste

1. Does landfill have two or more liners and a leachate collection system between the liners? __Yes /__No

2. Did owner/operator notify Regional Administrator 60 days prior to receiving waste (Part 265)? __Yes __No N/A

3. If landfill does not have two liners and a leachate collection system, did owner/operator adequately demonstrate to Regional Administrator that alternate design and operation prevents migration of hazardous constituents? __Yes __No

4. If no double liner exists, does landfill fall into one of the following exemption categories:

   a. Monofill only holds wastes from foundry furnace emission controls or metal casting molding sand? __Yes __No

   b. Monofill has at least one liner and there is no evidence that liner is leaking? __Yes __No N/A

   c. Owner/operator demonstrates that monofill is located, designed, and operated to prevent migration of hazardous constituents? __Yes __No

5. If landfill does not have two liners and a leachate collection system, does it have at least one liner for all existing portions (Part 264)? __Yes __No

   a. If yes, does this liner provide for the following:

      1. To prevent migration of wastes out of landfill to subsurface soil, ground water, and surface water (Part 264)? __Yes __No N/A
      2. A leachate collection and removal system immediately above the liner constructed to be chemically resistant to the waste and strong enough not to collapse under pressure (Part 264)? __Yes __No

6. If owner/operator does not comply with No. 5 above, is he exempt after demonstrating to Regional Administrator that alternate design and operation prevents migration of hazardous constituents (Part 264)? __Yes __No N/A

(continued)

EXHIBIT IV-10 (continued)

Section B - Operating Requirements

1. Are run-on controls preventing flow onto the active portion of the landfill? __Yes __No

2. Is runoff collected and controlled? __Yes __No

3. Are collection and holding facilities emptied after storms? __Yes __No

4. Is the landfill managed so that wind dispersal is controlled? __Yes __No

Section C - Monitoring and Inspection (Part 264)

1. Are liners inspected for defects during and after construction? __Yes __No

2. Are landfills inspected weekly and after storms for defects? __Yes __No

Section D - Surveying and Recordkeeping

1. Does owner/operator retain records at the facility? __Yes __No

   a. If yes, are the following maintained:

      1. On map, exact location and dimensions, including depths, of each cell? __Yes __No
      2. Contents of each cell and approximate location of each hazardous waste type within the cell? __Yes __No

Section E - Closure and Post-Closure

1. Is a closure plan kept on site? has been implemented __Yes __No

   a. If yes, does cover provide for the following:

      1. Minimizing migration of liquids? __Yes __No
      2. Minimum maintenance? __Yes __No
      3. Promote drainage; minimize erosion? __Yes __No
      4. Accommodate settling and subsidence? __Yes __No
      5. Less permeable than bottom liner or natural subsoils? __Yes __No

   b. After final closure, does owner/operator provide for the following:

(continued)

1.	Maintain final cover? no cover in place - site is overgrown w weeds	Yes No
2.	Continue to operate leachate collection and removal system until leachate is no longer collected?	X Yes No
3.	Maintain ground-water monitoring?	X Yes No
4.	Prevent run-on and runoff from eroding and damaging cover?	X Yes No
5.	Protect and maintain surveyed bench marks?	~~Yes~~ No not evaluated

Section F - Ignitable and Reactive Waste

1.	Are ignitable or reactive wastes placed in the landfill?	Yes No
a.	If yes, is waste treated, rendered, or mixed before or immediately after placement so that it is no longer ignitable or reactive?	Yes No N/A
2.	Are ignitable wastes in containers placed in landfill?	Yes No
a.	If yes, attach a narrative describing how these wastes are handled to prevent ignition or reaction?	

Section G - Incompatible Wastes

1.	Does owner/operator place incompatible wastes in landfill?	Yes No N/A

Section H - Bulk and Containerized Liquids

1.	Does landfill receive any bulk or containerized liquid hazardous waste?	Yes No
a.	If yes, have they been added to landfill since May 8, 1985?	Yes No
2.	Does landfill receive containers of free liquids?	Yes No
a.	If yes, is at least one of the following conditions met:	N/A
1.	Have free-standing liquids been removed by decanting or other methods; or have they been mixed with absorbent or solidified?	Yes No
2.	Are containers ampules?	Yes No
3.	Is container designed to hold free liquids?	Yes No
4.	Is container a lab pack?	Yes No

(continued)

3. Have containers holding liquids that are not hazardous wastes been placed in the landfill since November 8, 1985? __Yes __No

   a. If yes, is one of the following conditions met: N/A

      1. Was it the only reasonable alternative to place it in a landfill or unlined impoundment? __Yes __No
      2. Did placement not present a risk to contaminating any underground source of drinking water? __Yes __No

Section I - Container Requirements

1. Are containers placed in the landfill? __Yes X No

   a. If yes, are they either:

      1. 90 percent full? __Yes N/A
      2. Crushed, shredded, or similarly reduced in volume? __Yes N/A

Section J - Overpacked Drums

1. Are small containers of hazardous waste placed in landfill? __Yes X No

   a. If yes, are the following requirements met?

      1. Waste packaged in non-leaking container and tightly sealed? __Yes __No

   b. Containers not overpacked according to DOT regulations? __Yes __No

   c. Absorbent material does not react with waste? __Yes __No

   d. Incompatible wastes not placed outside the same container? __Yes N/A

   e. Reactive waste treated or rendered nonactive before packaging? __Yes __No

Section K - F020, F021, F022, F023, F026, and F027 Wastes (Part 264 only)

1. Are these wastes placed in landfill? __Yes X No

   a. If yes, did owner/operator receive permission from Regional Administrator to do so? __Yes __No

   b. Is documentation of "a" above on file at facility? Yes N/A

EXHIBIT IV-13

GROUND-WATER MONITORING CHECKLIST

Section A - Monitoring System

1. Does the facility have a ground-water monitoring system in operation? X Yes __No

   a. If yes, does the system consist of:

      1. One upgradient monitoring well (Part 265)? supposedly - adequate sampling not done X Yes __No
      2. Three downgradient monitoring wells (Part 265)? X Yes __No Yr

   b. Are monitoring wells cased so that the integrity of the boreholes is maintained (Part 265)? X Yes __No appear to from visual observat.

   c. Is a compliance monitoring system installed whenever hazardous waste constituents are detected at the compliance point (Part 264)? __Yes __No N/A

   d. Is a corrective-action program initiated whenever the ground-water protection standard is exceeded (Part 264)? __Yes __No N/A

   e. Is a detection monitoring program instituted in all other cases (Part 264)? __Yes __No N/A

2. Does facility have a monitoring and response program (Part 264)? __Yes __No

   a. If yes, is a compliance monitoring system instituted whenever hazardous constituents are detected at the compliance point (Part 264)? __Yes __No N/A

   b. Whenever the ground-water protection standard is exceeded, does facility institute a corrective-action program (Part 264)? __Yes __No

   c. In all other cases, does facility institute a detection monitoring program (Part 264)? __Yes __No

Section B - Sampling and Analysis (Part 265 only)

1. Does the facility obtain and analyze samples from the ground-water monitoring system? X Yes __No only samples from leachate collection systems. wells don't have enough water in them.

(continued)

a. Has facility developed and followed a ground-water sampling and analysis plan? __Yes __No
Adequate plan not in place because of fai
of wells to produce enough water for sampling.

a. If yes, does this plan include procedures and techniques for:

1. Sample collection? __Yes __No
2. Sample preservation? __Yes __No
3. Analytical procedures? N/A Yes __No
4. Chain-of-custody control? N/A Yes __No

b. Does the facility determine the concentration or value of the following parameters in ground-water samples?

1. Parameters characterizing the suitability of the ground water as a drinking water supply, as specified in §265, Appendix 3? __Yes __No
2. Parameters establishing ground-water quality (chloride, iron, manganese, phenols, sodium, sulfate)? __Yes __No
3. Parameters used as indicators of ground-water contamination (pH, specific conductance, total organic carbon, total organic halogen)? __Yes __No
not evaluated during inspection

c. Has the owner/operator established initial background concentrations or values of all parameters specified above at least on a quarterly basis? __Yes X No
not yet

d. Has owner/operator obtained at least four replicate measurements for each sample, and has he determined the initial background arithmetic mean and variance? __Yes X No

e. After the first year, does owner/operator sample and analyze with the following frequencies: __Yes __No

1. Samples collected to establish background quality (from above)? __Yes __No
not yet
2. Samples collected to indicate contamination (from above)? __Yes __No
3. Elevation of ground-water surface at each monitoring well at each sampling event? __Yes __No

Section C - Preparation, Evaluation, and Response (Part 265 only)

1. Did owner/operator prepare an outline of a ground-water quality assessment program? __Yes __No
not evaluated

(continued)

EXHIBIT IV-13 (continued)

a. If yes, did program determine the following:

1. Whether hazardous waste or hazardous waste constituents have entered the ground water? __Yes __No
2. Rate and extent of hazardous waste or hazardous waste constituent migration? __Yes __No
3. Concentrations of hazardous waste or hazardous waste constituents in ground water? __Yes __No

b. For each well, has owner/operator calculated the arithmetic mean and variance, based on four replicate measurements for each sample, and compared the results with initial background mean? __Yes __No

c. Has owner/operator submitted information documenting any significant increase in comparisons for upgradient wells (or decrease in pH)? __Yes __No

d. If the comparisons for downgradient wells show a significant increase (or pH decrease), has the owner/operator obtained additional ground-water samples from those downgradient wells in which a significant decrease was detected? (Samples must be split in two, and analyses must be obtained of all additional samples to determine whether the significant difference was a result of lab error? __Yes __No N/A

1. If analyses (described above) were performed, and confirmed the significant increase (or pH decrease), did owner/operator notify Regional Administrator within 7 days? __Yes __No

2. If analyses confirmed significant increase (or pH decrease), did owner/operator submit to the Regional Administrator within 14 days after notification (discussed above) a certified ground-water quality assessment program? __Yes __No

a. If yes, does plan include the following:

1. Number, location, and depth of wells? __Yes __No
2. Sampling and analytical methods for those hazardous wastes and hazardous waste constituents at the facility? __Yes __No
3. Evaluation procedures, including any use of previously gathered ground-water quality information? __Yes __No
4. Schedule of implementation? __Yes __No

4. Did owner/operator implement the ground-water quality-assessment program and, at a minimum, did he determine the following: __Yes __No

   a. Rate and extent of migration of the hazardous waste constituents in the ground water? __Yes __No

   b. Concentrations of the hazardous waste in the ground water? __Yes __No

5. Did owner/operator submit a report to Regional Administrator containing the requests of the assessment outlined in No. 3 above within 15 days? __Yes __No

6. Did owner/operator notify Regional Administrator of reinstatement of indicator evaluation program upon finding that no hazardous waste or hazardous waste constituents had entered the ground water? __Yes __No N/A

7. **If owner/operator determined that hazardous waste or hazardous waste constituents entered the ground water, did he either continue to make the determinations listed in No. 3 above on a quarterly basis until final closure or ground-water quality-assessment plan was implemented prior to post-closure care, or cease to make determinations required in No. 3 above if ground-water quality-assessment plan was implemented during post-closure?** __Yes __No

8. If any ground-water quality-assessment program is implemented to satisfy No. 3 above prior to final closure, has owner/operator completed program and reported to Regional Administrator, as outlined in No. 4 above? __Yes __No

9. **If owner/operator does not monitor at least annually to satisfy No. 3 above, does owner/operator evaluate data on ground-water elevation obtained under No. 2e in Section B above to determine whether the requirements for locating monitoring wells are satisfied?** __Yes __No

   a. If evaluation shows that the requirements for monitoring wells are not satisfied, has owner/operator modified the number, location, or depth of the monitoring wells to bring the system into compliance? __Yes __No

(continued)

Section D - Recordkeeping and Reporting (Part 265 only)

1. Unless owner/operator is monitoring to satisfy the requirements of §265.93(d)(4), does owner/operator:

   a. Keep records of the analyses required in §265.92(c) and (d), ground-water surface elevations required in 265.93(b) throughout the active life of the facility and throughout post-closure? X Yes __ No
   records of analysis are kept although regular sampling has not begun.

   b. Report the following information to the Regional Administrator:

      1. Within 15 days of analysis for each quarterly sampling event, does owner/operator submit results of background concentrations? Regular sampling not being done. __ Yes __ No
      2. Does owner/operator inform Regional Administrator about any parameters that exceed maximum contaminant levels listed in Appendix III? __ Yes __ No
      3. (Annually) does owner/operator report concentrations or values of parameters listed in §265.92(b)(3) for each well, including required evaluations for these parameters under §265.93(b)? __ Yes __ No N/A

         a. Does owner/operator also identify differences from initial background concentrations found in the upgradient wells no later than March 1 following each calendar year? __ Yes __ No

2. Does owner/operator submit results of the ground-water surface elevations under §265.93(f), along with a description of the response, if needed? __ Yes __ No

3. If ground water is monitored to satisfy requirements of §265.93(d)(4), did owner/operator do the following:

   a. Keep records of analyses and evaluations specified in the plan throughout active life and post-closure? __ Yes __ No

   b. (Annually, until final closure) submit to the Regional Administrator a report containing the results of the ground-water quality assessment program, including the calculated rate of migration of hazardous waste or hazardous waste constituents by March 1? __ Yes __ No

(continued)

EXHIBIT IV-11 (continued)

Section E - General Requirements (Part 264 only) not 264 facility

1. Does facility comply with the following requirements? N/A

   a. Are sufficient wells installed at appropriate locations and depths? __Yes X No

   b. Have sampling and analysis techniques been consistent? not evaluated __Yes __No

   c. Have ground-water elevation data been recorded? __Yes X No

   d. Have background concentrations been determined? __Yes X No

2. If ground water is monitored to satisfy requirements of §265.93(d)(4), owner/operator must: Insufficient water in wells.

   a. Keep records of the analyses and evaluations specified in the plan throughout the facility's active life, and, for disposal facilities, throughout post-closure. __Yes __No

   b. Report the following ground-water monitoring information:

      1. During the first year when initial background concentrations are being determined, did owner/operator submit values within 15 days after completing analysis? __Yes __No
      2. If yes, did owner/operator also submit an identification of any parameters whose concentrations exceed maximum levels in Appendix III? __Yes __No
      3. (Annually) did owner/operator report concentrations or values of the parameters listed in §265.92(b)(2) for each well, along with required evaluations for these parameters under §265.93(b)? __Yes __No
      4. Did owner/operator also separately identify any significant differences from initial background concentrations for upgradient wells? N/A __Yes __No
      5. Did owner/operator report on the results of ground-water surface elevations (and a description of the results if necessary) by March 1 of the following year? __Yes __No

Section F - Detection Monitoring Program (Part 264 only)

1. Has owner/operator established detection monitoring system to provide reliable indications for detection releases? N/A __Yes __No

(continued)

a. If yes, are the following components included in the system:

1. Background values? N/A __Yes __No
2. Determination of ground-water flow rate? __Yes __No
3. Determination of ground-water compliance point semiannually? __Yes __No
4. Determination of statistically significant increases over background concentrations? __Yes __No
5. Notification to Regional Administrator if there was a statistically significant increase? __Yes __No

Section G - Compliance Monitoring Program (Part 264 only)

1. Does facility operate a compliance monitoring program? __Yes __No

a. Does facility determine concentrations of hazardous constituents at least quarterly? __Yes __No

b. Does facility determine ground-water flow rate and direction in uppermost aquifer annually? N/A __Yes __No

c. Does facility analyze samples for Appendix VIII constituents annually? __Yes __No

d. Does facility make statistically significant increases over background values? __Yes __No

e. If there is an increase, does facility notify Regional Administrator and submit to establish a corrective-action program? __Yes __No

Section H - Corrective-Action Program (Part 264 only)

1. Does facility follow a corrective-action program that meets the facility's permit requirements? N/A __Yes __No

Treasured Moments

RBT Inspection
6/6/89
Jack Boller

Share your memories...

Ridgefield Brick & Tile 6/6/89
Jack Burke

Northeast corner of facility facing east.

Ridgefield Brick & Tile

Jack Boller

6/6/89

Northwest corner of facility facing west

Ridgefield Brick + Tile 6/6/89
Jack Boller

Eastern boundary of facility facing east

Ridgefield Brick + Tile 6/6/89
Jack Ball

Southeast corner of facility facing
east.

Ridgefield Brick & Tile 6/6/89

Jack Boller

South boundary of facility facing south.

Ridgefield Brick & Tile 6/6/89

Jack Ball

Southwest corner of facility facing south.

Ridgefield Brick & Tile 6/6/89

Jack Ball

Toe drain for leachate collection.

Ridgefield Brick & Tile 6/6/89
Joel Bolle

Typical monitoring well

Ridgefield Brick + Tile 6/6/89

Jack Bolla

Leachate collection tank.